

1 **REMARKS**

2 Claim 36 is amended. Claims 1-76 remain in the application for  
3 consideration. In view of the following remarks amendments and/or remarks,  
4 Applicant respectfully requests that the application be forwarded onto issuance.  
5

6 **The Claim Rejections**

7 Claims 1-28, 39-50 and 56-71 stand rejected under 35 U.S.C. §102(e) as  
8 being anticipated by U.S. Patent Application Publication No. 2001/0031066 to  
9 Meyer et al. (hereinafter "Meyer").

10 Claims 29-36 and 51-55 stand rejected under 35 U.S.C. §103(a) as being  
11 obvious over U.S. Patent No. 6,553,379 to Jaeger.

12 Claims 72-76 stand rejected under 35 U.S.C. §103(a) as being obvious over  
13 U.S. Patent No. 6,345,256 to Milsted.  
14

15 **The Claims Rejected Over Meyer**

16 **Claim 1** recites a method of processing media content comprising:

- 17
- 18 • receiving a physical ID that corresponds to a specific media upon  
which content resides that can be experienced by a user;
  - 19 • mapping the physical ID to a logical ID; and
  - 20 • searching a database that contains metadata associated with the  
specific media by using the logical ID as a basis for a search query.
- 21

22 In making out the rejection of this claim, the Office argues that its subject  
23 matter is anticipated by Meyer, and cites to paragraph 07, lines 4-8, paragraph  
24 018, lines 5-9 and paragraph 07, lines 12-15 in support therefore. Paragraphs 07  
25 and 018 are reproduced below for the convenience of the Office.

1 [0007] This document describes systems and processes for linking  
2 audio and other multimedia data objects with metadata and actions via a  
3 communication network, e.g., computer, broadcast, wireless, etc. Media  
4 objects are transformed into active, connected objects via identifiers  
5 embedded into them or their containers. These identifiers can be embedded  
6 by the owner or distributor of the media object, or automatically created  
7 from the media object. In the context of a user's playback experience, a  
8 decoding process extracts the identifier from a media object and possibly  
9 additional context information and forwards it to a server. The server, in  
10 turn, maps the identifier to an action, such as returning metadata, re-  
11 directing the request to one or more other servers, requesting information  
12 from another server to identify the media object, etc. If the identifier has no  
13 defined action, the server can respond with an option for the user to buy the  
14 link and control the resulting action for all objects with the current  
15 identifier. The linking process applies to broadcast objects as well as  
16 objects transmitted over networks in streaming and compressed file  
17 formats.

18 [0018] In some application scenarios, the embedding process  
19 interacts with a registration process to get an identifier. *The embedding  
20 process provides information about the object (e.g., a title and artist  
21 name, an ISRC, name of distributor, etc.).* In response, the registration  
22 process provides an identifier and stores a database record of the  
23 association between identifier and the object or other information used in  
24 decoding to identify the object, such as its distributor or broadcaster. The  
25 registration process may be used to assign an identifier to an audio object  
and to distributors or broadcasters of audio objects. The embedding and  
registration processes may occur before the audio object is distributed to  
consumers, or sometime thereafter, such as when a user transfers (e.g.,  
"rips") a media object from one format to another (e.g., a packaged format  
to an electronic file format such as a compressed file format).

Meyer describes methods and systems for linking audio and other  
multimedia data objects with metadata and actions via a communication network.  
In describing types of "media objects" and "audio objects", Meyer instructs as  
follows in paragraph [0012]:

1 In the context of this document, the terms "media object" and "audio  
2 object" refer to an electronic form of a media signal and audio signal, respectively.

3 Further on in Meyer's disclosure, Meyer describes an audio object as a  
4 song. See, e.g. paragraph [0014]. In paragraph [0016], Meyer notes that one type  
5 of identifier is an object ID that identifies an audio object. Meyer further instructs  
6 that the object ID can be a number associated with the object, such as its  
7 International Standard Recording Code (ISRC). Further on, in paragraph [0018],  
8 Meyer describes the identifier embedding process and notes that the embedding  
9 process can provide information about the object such as the title and artist name,  
10 an ISRC and the like. The registration process then takes this information and  
11 provides an identifier.

12 Hence, it appears that Meyer is primarily directed to methods and systems  
13 that contemplate single media objects such as individual songs. For example, in  
14 the information that Meyer describes as being used in the embedding process,  
15 when viewed in light of Meyer's examples, most if not all of the items appear to  
16 be singularly associated with an individual song (e.g. title and artist name, ISRC  
17 and the like). In addition, Meyer appears to be directed to providing identifiers for  
18 individual songs or single media objects.

19 The present claim, on the other hand, recites:

- 20
- 21 • receiving a physical ID *that corresponds to a specific media* upon  
22 which content resides that can be experienced by a user;
  - 23 • mapping the physical ID to a logical ID; and
- 24  
25

- searching a database that contains *metadata associated with the specific media* by using the logical ID as a basis for a search query.

Hence, this claim is directed to a method that receives a physical ID that corresponds to a *specific media* upon which content resides, mapping the physical ID to a logical ID, and then searching for metadata associated with the *specific media*.

As but one example of subject matter from the Specification that is within the spirit of this claim, consider the following text taken from the Specification starting on page 11, line 11:

**Physical Media Identification and Unique Logical ID Mapping**

In one described embodiment, a physical ID or “PID” is associated with each media upon which the content that is to be experienced by a user resides. The PID is assigned or otherwise associated with a logical ID or “LID”, and the LID is then used as the basis for any database queries.

Consider, for example, Fig. 3. There, six CDs are shown—two each of the Backstreet Boys “Black and Blue” CD, Britney Spears “Stronger” CD and Weird Al’s “Running with Sissors” CD. Each of these CDs belongs to a different person. As shown, each CD has a physical ID associated with it. Each physical ID is different. For example, there are two different physical IDs associated with the Backstreet Boys CD (i.e. “12345” and “34567”). Yet, each of these different physical IDs is mapped to the same logical ID (i.e. ABCDE). This logical ID is then used by the system as the basis for any database queries for metadata associated with the Backstreet Boys CD.

Meyer neither discloses nor suggests any such subject matter. As such, this claim is allowable.

**Claims 2-7** depend from claim 1 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited

1 features which, in combination with those recited in claim 1, are neither disclosed  
2 nor suggested in the references cited and applied by the Office.

3 **Claim 8** recites a server comprising:

- 4 • one or more processors;
- 5 • one or more storage devices; and
- 6 • software code resident on the one or more storage devices which,  
7 when executed by the one or more processors, cause the processors  
8 to:
  - 9 ○ receive a *physical ID that corresponds to a specific media*  
10 upon which content resides that can be experienced by a user;
  - 11 ○ map the physical ID to a logical ID;
  - 12 ○ search a database that contains *metadata associated with the*  
13 *specific media by using the logical ID* as a basis for a search  
14 query;
  - 15 ○ format the metadata in a XML schema; and
  - 16 ○ return the formatted metadata to a client.

17 In making out the rejection of this claim, the Office argues that Meyer  
18 anticipates its subject matter. Applicant disagrees. For example, as noted above,  
19 Meyer does not disclose a server that receives a physical ID that corresponds to a  
20 specific media, maps the physical ID to a logical ID and then uses the logical ID to  
21 search a database for metadata associated with the specific media.

22 As such, Meyer does not anticipate this claim and this claim is allowable.

23 **Claim 9** recites one or more computer-readable media having computer-  
24 readable instructions thereon which, when executed by a computer, cause the  
25 computer to:

- receive a *physical ID that corresponds to a specific media* upon  
which content resides that can be experienced by a user;
- map the physical ID to a logical ID;

- search a database that contains *metadata associated with the specific media by using the logical ID* as a basis for a search query;
- format the metadata in a XML schema; and
- return the formatted metadata to a client.

In making out the rejection of this claim, the Office argues that Meyer anticipates its subject matter. Applicant disagrees. For example, as noted above, Meyer does not disclose receiving a physical ID that corresponds to a specific media, mapping the physical ID to a logical ID, and then using the logical ID to search a database for metadata associated with the specific media. Accordingly, this claim is allowable.

**Claim 10** recites a method of processing media content comprising:

- associating a physical ID with a logical ID, the *physical ID corresponding to a specific media* associated with content that can be experienced by a user;
- *using the logical ID to query one or more databases that contain metadata associated with the specific media*; and
- returning metadata associated with the specific media to a client.

In making out the rejection of this claim, the Office argues that Meyer anticipates its subject matter. Applicant disagrees. For the reasons mentioned above, Meyer does not anticipate this claim and, as such, this claim is allowable.

**Claims 11-18** depend from claim 10 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 10, are neither disclosed nor suggested in the references cited and applied by the Office.

**Claim 19** recites a method of processing media content comprising:

- receiving a *physical ID that corresponds to a specific media associated with content* that can be experienced by a user;
- attempting to map the physical ID to a logical ID;
- if a logical ID is found that corresponds to the physical ID, *searching a database that contains metadata associated with the specific media* by using the logical ID as a basis for a search query;
- if no logical ID is found that corresponds to the physical ID, attempting to establish a logical ID for the physical ID.

In making out the rejection of this claim, the Office argues that Meyer anticipates its subject matter. Applicant disagrees. For the reasons mentioned above, Meyer does not anticipate this claim and, as such, this claim is allowable.

**Claims 20-26** depend from claim 19 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 19, are neither disclosed nor suggested in the references cited and applied by the Office.

**Claim 27** recites a server computer comprising:

- one or more processors;
- one or more storage devices; and
- software code resident on the one or more storage devices which, when executed by the one or more processors, cause the processors to:
  - receive a *physical ID that corresponds to a specific media* upon which content resides that can be experienced by a user;
  - attempt to map the physical ID to a logical ID;
  - if a logical ID is found that corresponds to the physical ID, search a database that contains *metadata associated with the specific media* by using the logical ID as a basis for a search query; and
  - if no logical ID is found that corresponds to the physical ID, attempt to establish a logical ID for the physical ID.

1 In making out the rejection of this claim, the Office argues that Meyer  
2 anticipates its subject matter. Applicant disagrees. For the reasons mentioned  
3 above, Meyer does not anticipate this claim and, as such, this claim is allowable.

4 **Claim 28** depends from claim 27 and is allowable as depending from an  
5 allowable base claim. This claim is also allowable for its own recited features  
6 which, in combination with those recited in claim 27, are neither disclosed nor  
7 suggested in the references cited and applied by the Office.

8 **Claim 39** recites a method of processing media content comprising:

- 9
- 10 • receiving a *physical ID that corresponds to a specific media* upon  
which content resides that can be experienced by a user;
  - 11 • attempting to map the physical ID to a logical ID, *the logical ID*  
12 *serving as a basis for a search query of a database that contains*  
*metadata associated with the specific media*;
  - 13 • if no logical ID is found that corresponds to the physical ID,  
14 attempting to establish a logical ID for the physical ID by causing a  
Wizard user interface (UI) to be presented to a user via a client  
15 computer so that information pertaining to the user's specific media  
can be collected from the user.
- 16

17 In making out the rejection of this claim, the Office argues that Meyer  
18 anticipates its subject matter. Applicant disagrees. For the reasons mentioned  
19 above, Meyer does not anticipate this claim and, as such, this claim is allowable.

20 **Claims 40-46** depend from claim 39 and are allowable as depending from  
21 an allowable base claim. These claims are also allowable for their own recited  
22 features which, in combination with those recited in claim 39, are neither disclosed  
23 nor suggested in the references cited and applied by the Office.

24

25



1       **Claim 47** recites one or more computer-readable media having computer-  
2 readable instructions thereon which, when executed by a computer, cause the  
3 computer to:

- 4       • receive a *physical ID that corresponds to a specific media* upon  
5       which content resides that can be experienced by a user;
- 6       • attempt to map the physical ID to a logical ID, the *logical ID*  
7       *serving as a basis for a search query of a database that contains*  
8       *metadata associated with the specific media*;
- 9       • if no logical ID is found that corresponds to the physical ID, attempt  
10      to establish a logical ID for the physical ID by causing a Wizard user  
11      interface (UI) to be presented to a user via a client computer so that  
12      information pertaining to the user's specific media can be collected  
13      from the user.

14       In making out the rejection of this claim, the Office argues that Meyer  
15 anticipates its subject matter. Applicant disagrees. For the reasons mentioned  
16 above, Meyer does not anticipate this claim and, as such, this claim is allowable.

17       **Claim 48** recites a system for providing metadata to clients comprising:

- 18       • a server configured to receive *physical IDs that correspond to a*  
19       *specific media* upon which content resides that can be experienced  
20       by a user;
- 21       • one or more databases containing metadata associated with various  
22       media; and
- 23       • at least one table containing *physical IDs and associated logical IDs*  
24       *to which the physical IDs are mapped, the logical IDs being*  
25       *configured for use by the server in searching the one or more*  
      *databases for metadata associated with specific media.*

26       In making out the rejection of this claim, the Office argues that Meyer  
27 anticipates its subject matter. Applicant disagrees. For the reasons mentioned  
28 above, Meyer does not anticipate this claim and, as such, this claim is allowable.

1       **Claims 49-50** depend from claim 48 and are allowable as depending from  
2 an allowable base claim. These claims are also allowable for their own recited  
3 features which, in combination with those recited in claim 48, are neither disclosed  
4 nor suggested in the references cited and applied by the Office.

5       **Claim 56** recites a method of processing media content comprising:

- 6       • receiving a *physical ID that corresponds to a specific CD* upon
- 7       which content resides that can be experienced by a user;
- 8       • mapping the physical ID to a logical ID;
- 9       • searching a database that contains *metadata associated with the CD*
- 10       *by using the logical ID as a basis for a search query*;
- 11       • formatting the metadata in a XML schema; and
- 12       • returning the formatted metadata to a client.

13       In making out the rejection of this claim, the Office argues that Meyer  
14 anticipates its subject matter. Applicant disagrees. For the reasons mentioned  
15 above, Meyer does not anticipate this claim and, as such, this claim is allowable.

16       **Claims 57-60** depend from claim 56 and are allowable as depending from  
17 an allowable base claim. These claims are also allowable for their own recited  
18 features which, in combination with those recited in claim 56, are neither disclosed  
19 nor suggested in the references cited and applied by the Office.

20       **Claim 61** recites a method of processing media content comprising:

- 21       • receiving a *physical ID that corresponds to a specific DVD* upon
- 22       which content resides that can be experienced by a user;
- 23       • mapping the physical ID to a logical ID;
- 24       • searching a database that contains *metadata associated with the*
- 25       *DVD by using the logical ID as a basis for a search query*;
- formatting the metadata in a XML schema; and
- returning the formatted metadata to a client.

1  
2 In making out the rejection of this claim, the Office argues that Meyer  
3 anticipates its subject matter. Applicant disagrees. For the reasons mentioned  
4 above, Meyer does not anticipate this claim and, as such, this claim is allowable.

5 **Claim 62** depends from claim 61 and is allowable as depending from an  
6 allowable base claim. This claim is also allowable for its own recited features  
7 which, in combination with those recited in claim 61, are neither disclosed nor  
8 suggested in the references cited and applied by the Office.

9 **Claim 63** recites an XML schema comprising:

- 10
- 11 • a name tag associated with a CD name;
  - 12 • an author tag associated with a CD author;
  - 13 • a track tag associated with a CD track;
  - 14 • at least one URL tag referencing a link to additional information  
pertaining to the CD; and
  - 15 • the schema being configured for use in sending metadata associated  
with a CD to client computer for display for a user.

16 In making out the rejection of this claim, the Office argues that its subject  
17 matter is anticipated by Meyer citing to paragraphs 015, 012, 014 and 027.  
18 Applicant disagrees. Nowhere in any of these portions of Meyer is there any  
19 disclosure of a specific XML schema as recited above. Accordingly, Meyer does  
20 not anticipate this claim and it is allowable.

21 **Claims 64-65** depend from claim 63 and are allowable as depending from  
22 an allowable base claim. These claims are also allowable for their own recited  
23 features which, in combination with those recited in claim 63, are neither disclosed  
24 nor suggested in the references cited and applied by the Office.  
25

1       **Claim 66** recites an XML schema comprising:

- 2
- 3       • a title tag associated with a title of a movie embodied on a DVD; and
  - 4       • at least one URL tag referencing a link to additional information  
5       pertaining to the DVD.

6       In making out the rejection of this claim, the Office argues that its subject  
7       matter is anticipated by Meyer citing to paragraphs 028 and 014. Applicant  
8       disagrees. Nowhere in any of these portions of Meyer is there any disclosure of a  
9       specific XML schema as recited above. Accordingly, Meyer does not anticipate  
10      this claim and it is allowable.

11      **Claims 67-68** depend from claim 66 and are allowable as depending from  
12      an allowable base claim. These claims are also allowable for their own recited  
13      features which, in combination with those recited in claim 66, are neither disclosed  
14      nor suggested in the references cited and applied by the Office.

15      **Claim 69** recites a method of processing media content comprising:

- 16
- 17      • generating a *physical ID that corresponds to a specific media* upon  
18      which content resides that can be experienced by a user on a client  
19      computer;
  - 20      • sending the *physical ID to a server configured to return metadata*  
21      *associated with the specific media*;
  - 22      • receiving, from the server, XML-formatted metadata;
  - 23      • parsing, with the client computer, the XML-formatted metadata; and
  - 24      • displaying the metadata for the user on the client computer.
- 25

22      In making out the rejection of this claim, the Office argues that Meyer  
23      anticipates its subject matter. Applicant disagrees. Meyer does not appear to  
24      anticipate this claim for at least the reason that it does not appear to receive XML-

1 formatted metadata associated with *specific media* for which a physical ID was  
2 sent. Accordingly, this claim is allowable.

3 **Claims 70-71** depend from claim 69 and are allowable as depending from  
4 an allowable base claim. These claims are also allowable for their own recited  
5 features which, in combination with those recited in claim 69, are neither disclosed  
6 nor suggested in the references cited and applied by the Office.

### 7 8 **The Claims Rejected Over Jaeger**

9 **Claim 29** recites a method of processing media content comprising:

- 10
- 11 • receiving a *physical ID that corresponds to a specific media* upon  
which content resides that can be experienced by a user;
  - 12 • attempting to map the physical ID to a logical ID by searching a first  
table containing physical ID-to-logical ID mappings using a first  
13 search;
  - 14 • if the first search is unsuccessful, searching a second table  
containing physical ID-to-logical ID mappings using a second  
15 search; and
  - 16 • if a logical ID is found that corresponds to the physical ID, searching  
a database that contains metadata associated with the specific media  
by using the logical ID as a basis for a search query.
- 17

18 In making out a rejection of this claim, the Office argues that Jaeger renders  
19 obvious the subject matter of this claim. Applicant disagrees. For example, the  
20 Office argues that Jaeger discloses receiving a physical ID that corresponds to a  
21 specific media as recited in this claim, citing to column 4, lines 33-46 and column  
22 4, lines 50-56. Applicant disagrees.

23 Jaeger describes a method and system that processes address data. Jaeger  
24 instructs that the address data includes name, prename, title, street, zip code and  
25

1 the like. This information in no way, shape or form is related to the subject matter  
2 of this claim. The Office further argues that Jaeger's description of lists and data  
3 records is equivalent to the description of the information contained in the physical  
4 to logical IDS mapping table. This is simply not the case.

5 Jaeger is not even remotely germane to the subject matter recited in this  
6 claim. The Office has failed to establish a *prima facie* case of obviousness for a  
7 number of different reasons not the least of which is the failure of Jaeger to even  
8 remotely suggest the subject matter of this claim. In addition, the Office's stated  
9 motivation in making out this rejection does not make sense.

10 Accordingly, this claim is allowable.

11 **Claims 30-34** depend from claim 29 and are allowable as depending from  
12 an allowable base claim. These claims are also allowable for their own recited  
13 features which, in combination with those recited in claim 29, are neither disclosed  
14 nor suggested in the references cited and applied by the Office.

15 **Claim 35** recites one or more computer-readable media having computer-  
16 readable instructions thereon which, when executed by a computer, cause the  
17 computer to:

- 18 • receive a *physical ID that corresponds to a specific media* upon  
19 which content resides that can be experienced by a user;
- 20 • attempt to map the physical ID to a logical ID by searching a first  
21 table containing physical ID-to-logical ID mappings using a first  
22 search, the first search comprising a low cost search;
- 23 • if the first search is unsuccessful, search a second table containing  
24 physical ID-to-logical ID mappings using a second search;
- 25 • if the second search is unsuccessful, search the first table using a  
third search, the third search comprising a higher cost search than  
the first search; and

- if a logical ID is found that corresponds to the physical ID, search a database that contains metadata associated with the specific media by using the logical ID as a basis for a search query.

In making out a rejection of this claim, the Office argues that Jaeger renders obvious the subject matter of this claim. Applicant disagrees. For example, the Office argues that Jaeger discloses receiving a physical ID that corresponds to a specific media as recited in this claim, citing to column 4, lines 33-46 and column 4, lines 50-56. Applicant disagrees.

Jaeger describes a method and system that processes address data. Jaeger instructs that the address data includes name, prename, title, street, zip code and the like. This information in no way, shape or form is related to the subject matter of this claim. The Office further argues that Jaeger's description of lists and data records is equivalent to the description of the information contained in the physical to logical IDS mapping table. This is simply not the case.

Jaeger is not even remotely germane to the subject matter recited in this claim. The Office has failed to establish a *prima facie* case of obviousness for a number of different reasons not the least of which is the failure of Jaeger to even remotely suggest the subject matter of this claim. In addition, the Office's stated motivation in making out this rejection does not make sense.

Accordingly, this claim is allowable.

**Claim 36** (amended to correct a typographical error) recites a method of processing media content comprising:

- providing a canonical table containing physical ID to logical ID mappings, the *physical IDs being associated with specific media* containing content that can be experienced by a user, the logical IDs

1 being configured for use in database queries to locate metadata  
2 associated with specific media;

- 3 • providing a table containing user-provided physical ID to logical ID  
4 mappings;
- 5 • receiving a physical ID associated with a specific media;
- 6 • conducting a first low cost search of the canonical table to determine  
7 whether there is a matching physical ID with a corresponding logical  
8 ID;
- 9 • if the first low cost search is unsuccessful, conducting a second low  
10 cost search of the table containing the user-provided physical ID to  
11 logical ID mappings to determine whether there is a matching  
12 physical ID with a corresponding logical ID;
- 13 • if the second low cost search is unsuccessful, conducting a third  
14 higher cost search of the canonical table to determine whether there  
15 is a matching physical ID with a corresponding logical ID; and
- 16 • if any of the searches are successful, using the corresponding logical  
17 ID to search a database containing metadata associated with the  
18 specific media.

19 In making out a rejection of this claim, the Office argues that Jaeger renders  
20 obvious the subject matter of this claim. Applicant disagrees. For example, the  
21 Office argues that Jaeger discloses mappings of physical IDs to logical IDs, where  
22 the physical IDs are associated with specific media as recited in this claim, citing  
23 to column 4, lines 33-46 and column 4, lines 50-56. Applicant disagrees.

24 Jaeger describes a method and system that processes address data. Jaeger  
25 instructs that the address data includes name, prename, title, street, zip code and  
the like. This information in no way, shape or form is related to the subject matter  
of this claim. The Office further argues that Jaeger's description of lists and data  
records is equivalent to the description of the information contained in the physical  
to logical IDS mapping table. This is simply not the case.

Jaeger is not even remotely germane to the subject matter recited in this  
claim. The Office has failed to establish a *prima facie* case of obviousness for a



1 number of different reasons not the least of which is the failure of Jaeger to even  
2 remotely suggest the subject matter of this claim. In addition, the Office's stated  
3 motivation in making out this rejection does not make sense.

4 Accordingly, this claim is allowable.

5 **Claims 37-38** depend from claim 36 and are allowable as depending from  
6 an allowable base claim. These claims are also allowable for their own recited  
7 features which, in combination with those recited in claim 36, are neither disclosed  
8 nor suggested in the references cited and applied by the Office.

9 **Claim 51** recites a system for providing metadata to clients comprising:

- 10 • a canonical table comprising multiple *physical IDs associated with*  
11 *specific media* containing content that can be experienced by a user;
- 12 • multiple logical IDs associated with the multiple physical IDs;
- 13 • individual physical IDs being mapped to individual logical IDs; and
- 14 • the logical IDs being configured for use in database queries to locate  
15 metadata associated with specific media.

16 In making out a rejection of this claim, the Office argues that Jaeger renders  
17 obvious the subject matter of this claim. Applicant disagrees. For example, the  
18 Office argues that Jaeger discloses physical IDs and logical IDs as recited in this  
19 claim. Applicant disagrees.

20 Jaeger describes a method and system that processes address data. Jaeger  
21 instructs that the address data includes name, prename, title, street, zip code and  
22 the like. This information in no way, shape or form is related to the subject matter  
23 of this claim. Jaeger is not even remotely germane to the subject matter recited in  
24 this claim. The Office has failed to establish a *prima facie* case of obviousness for  
25 a number of different reasons not the least of which is the failure of Jaeger to even

1 remotely suggest the subject matter of this claim. In addition, the Office's stated  
2 motivation in making out this rejection does not make sense.

3 Accordingly, this claim is allowable.

4 **Claims 52-55** depend from claim 51 and are allowable as depending from  
5 an allowable base claim. These claims are also allowable for their own recited  
6 features which, in combination with those recited in claim 51, are neither disclosed  
7 nor suggested in the references cited and applied by the Office.

### 8 9 **The Claims Rejected Over Milsted**

10 **Claim 72** recites a method of providing metadata to a client comprising:

- 11
- 12 • establishing a table that contains *user-provided entries that map*  
13 *physical IDs to logical IDs, the physical IDs corresponding to*  
14 *specific media upon which content resides* that can be experienced  
15 by various users, the logical IDs being configured for use in  
16 querying one or more databases that contain metadata associated  
17 with the specific media, the metadata being returnable to a client;
  - 18 • statistically evaluating the entries to determine, for each physical ID,  
19 a most likely logical ID match; and
  - 20 • making the most likely logical ID match available so that it can be  
21 used to query the one or more databases.

22 In making out the rejection of this claim, the Office argues that its subject  
23 matter is rendered obvious in view of Milsted, citing to column 6, lines 34-38,  
24 column 6, lines 42047 and column 47, lines 47-53. Applicant disagrees.

25 These excerpts do not mention user-provided entries that map physical IDs  
to logical IDs. Quite frankly, Applicant does not understand how these cited  
excerpts are even remotely germane to the recited subject matter of this claim.

1 Accordingly, for a number of reasons, the Office has failed to establish a *prima*  
2 *facie* case of obviousness.

3 **Claim 73** depends from claim 72 and is allowable as depending from an  
4 allowable base claim. This claim is also allowable for its own recited features  
5 which, in combination with those recited in claim 72, are neither disclosed nor  
6 suggested in the references cited and applied by the Office.

7 **Claim 74** recites a method of providing metadata to a client comprising:

- 8
- 9 • providing a table containing user-provided entries that map physical  
10 IDs to logical IDs, the physical IDs corresponding to specific media  
11 upon which content resides that can be experienced by various users,  
12 the logical IDs being configured for use in querying one or more  
13 databases that contain metadata associated with the specific media,  
14 the metadata being returnable to a client;
- 15 • computing, from the table, a list of physical IDs that are to be  
16 statistically evaluated;
- 17 • for each listed physical ID, ascertaining the logical IDs that have  
18 been associated with it by users;
- 19 • computing a distribution of logical IDs for a given physical ID, the  
20 distribution describing, for each logical ID, the number of times the  
21 physical ID has been mapped thereto;
- 22 • adding to the distribution, an entry that corresponds to a current  
23 trusted logical ID mapping;
- 24 • weighting the added entry; and
- 25 • computing, from the distribution, a most likely physical ID to logical  
ID match.

21 In making out the rejection of this claim, the Office argues that its subject  
22 matter is rendered obvious in view of Milsted, citing to, among other portions,  
23 column 6, lines 34-38, column 6, lines 42047 and column 47, lines 47-53.  
24 Applicant disagrees.  
25

1        These excerpts do not mention user-provided entries that map physical IDs  
2 to logical IDs. Quite frankly, Applicant does not understand how these cited  
3 excerpts are even remotely germane to the recited subject matter of this claim.  
4 Accordingly, for a number of reasons, the Office has failed to establish a *prima*  
5 *facie* case of obviousness.

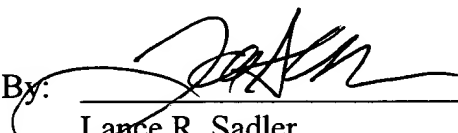
6        **Claims 75 and 76** depend from claim 74 and are allowable as depending  
7 from an allowable base claim. These claims are also allowable for their own  
8 recited features which, in combination with those recited in claim 74, are neither  
9 disclosed nor suggested in the references cited and applied by the Office.

10  
11        **Conclusion**

12        All of the claims are in condition for allowance. Accordingly, Applicant  
13 requests a Notice of Allowability be issued forthwith. If the Office's next  
14 anticipated action is to be anything other than issuance of a Notice of Allowability,  
15 Applicant respectfully requests a telephone call for the purpose of discussing an  
16 appeal.

17        Respectfully Submitted,

18  
19        Dated: 11/24/04

20        By:   
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24  
25